

2 January 2020

Committee Secretary  
Health, Communities, Disability Services and Domestic and Family Violence Prevention Committee  
Parliament House  
George Street  
Brisbane QLD 4000

By Email: [Health@parliament.qld.gov.au](mailto:Health@parliament.qld.gov.au)

Dear Committee Members,

**Health Legislation Amendment Bill 2019**

**Prohibition of Conversion Therapy**

**Submission by Associated Christian Schools**

Associated Christian Schools Ltd (“**ACS**”) is a faith-based charity established to advance education from a Christian worldview for the public benefit. In doing so, ACS provides collegial support to Member Schools and facilitates personal and professional development for Member School leaders to encourage and equip them in their mission to promote education with Christian values.

ACS represents 38 member schools throughout Queensland, with approximately 22000 enrolled students across these member schools.

ACS welcomes the Government’s consultation on the *Health Legislation Amendment Bill 2019* (the “**Bill**”). ACS provides this submission in respect of Part 5 of the Bill, and specifically as it pertains to Conversion Therapies. Many of our member schools employ School Counsellors and/or Pastoral Care Counsellors, and ACS provides this submission in respect of the work these counsellors perform (who ACS considers would probably come within the statutory definition of Health Service Providers).

ACS recognises that some religious bodies have, in the past, pressured young people into undergoing same sex attraction conversion therapy, and that this resulted in unfortunate harm to the mental health of these young people. Having regard to this, it is appropriate that there be some form of statutory protection to safeguard young people, who are particularly vulnerable to such harm.

However, it is important that any legislative safeguards also take into account the religious doctrines and beliefs of Health Service Providers and their employing institutions, and the right of religious institutions to be able to communicate these doctrines and beliefs. The Bill should not prevent religious counsellors, particularly when they are engaged within a religious institution (such

as a religious educational institution), from communicating the institution's religious doctrines and beliefs, whether they pertain to sexuality, gender identity or indeed any other issue. Such conduct should not result in potentially criminal sanctions against the Health Service Provider, particularly where there are already other statutory protections to protect against vilification and similar egregious conduct. ACS hopes that this is not the intent of the Bill; however the broad definition of Conversion Therapy does lead to this apprehension.

In this regard, ACS submits that the Bill should include a specific exemption for Health Service Providers, where they are employed or engaged by a religious institution (including a religious educational institution), authorising the provision of Health Services that accords with the doctrines and beliefs of the religious institution.

Further or alternatively, ACS submits that the Bill should make it clear that Conversion Therapy does not extend to the communication of religious doctrine and belief, again in circumstances where the Health Service Provider is employed or engaged within a religious institution (including a religious educational institution).

Finally, whilst ACS agrees that young people should have the benefit of certain legislative protections; it is less clear why such prohibitions should apply in respect of adults who, by way of their informed consent, freely participate in counselling regarding their sexuality and gender identity. Again, Health Service Providers should not face criminal sanctions when communicating their religious doctrines and beliefs and providing treatment consistent with these religious doctrines and beliefs, particularly where an adult freely engages with the Health Service Provider for the purpose of obtaining counselling consistent with these religious doctrines and beliefs.

Thank you for the opportunity to provide these submissions. If you have any queries regarding this matter, please contact Dr Lynne Doneley on [REDACTED] or [REDACTED].

Yours sincerely



**Dr Lynne Doneley**  
**Executive Director/Principal Research Officer**  
Associated Christian Schools



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**Christian education for  
the common good.**

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